

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** :

**v.** :

**SAROM SOT** :

**CRIMINAL NO. 22-**

**DATE FILED: \_\_\_\_\_**

**VIOLATIONS:**

**18 U.S.C. §1343 (wire fraud – 5 counts)**

**42 U.S.C. § 1383a(a)(3) (Social Security**

**fraud – 1 count)**

**Notice of forfeiture**

**INDICTMENT**

**COUNTS ONE THROUGH FIVE**

**(Wire Fraud)**

**THE GRAND JURY CHARGES THAT:**

At all times relevant to this indictment:

1. The Social Security Administration (“SSA”), an agency of the United States, administered certain government benefit programs, including the Supplemental Security Income (“SSI”) program, pursuant to Title 42, United States Code, Sections 1381-1383f.
2. The SSI program, which was funded through general tax revenues of the United States, provided monthly cash benefits to individuals who were age sixty-five or over, who were “disabled” and who demonstrated financial need, as determined by his or her “income” and “resources,” as those terms were defined for purposes of the Social Security Act.
3. SSI payments continued until as long as the individual remained eligible and until the individual died.

4. The father of defendant SAROM SOT, identified herein as "S.S.," received SSI benefits during his lifetime. No other individual was entitled to the benefits designated for S.S., and the benefits were to be suspended upon the death of S.S. The SSA provided these benefits through an electronic funds transfer to a Wells Fargo account held in the name of S.S.

5. S.S. died in approximately January 2010.

6. SSA has no record of notification of S.S.'s death and continued to issue SSI benefits through an electronic funds transfer to S.S.'s Wells Fargo account.

#### **THE SCHEME TO DEFRAUD**

7. From in or about March 2010 through in or about July 2018, defendant

#### **SAROM SOT**

devised and intended to devise a scheme to defraud the SSA and to obtain money from the SSA in the form of benefit payments intended for S.S., by fraudulently converting to her own use the SSA benefits intended for S.S., which benefits the defendant SOT was not entitled to receive.

8. It was the object of the scheme described in paragraph 7 for defendant SAROM SOT to convert to her own use SSA benefit payments intended for S.S. that defendant SOT was not entitled to receive.

#### **MANNERS AND MEANS**

It was a part of the scheme that:

9. Defendant SAROM SOT failed to disclose, and concealed, the death of S.S., so that S.S.'s SSA benefits would continue to be deposited into S.S.'s Wells Fargo bank account.

10. From in or about March 2010 through in or about July 2018, defendant SAROM SOT fraudulently obtained and converted to her own use approximately \$72,712 in SSA benefits payments intended for S.S.

11. On or about the following dates, in the Eastern District of Pennsylvania, and elsewhere, defendant

**SAROM SOT,**

for the purpose of executing the scheme to defraud described above, and to obtain money and property by means of false and fraudulent pretenses, knowingly caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

<u>COUNT</u>	<u>DATE</u>	<u>WIRE TRANSACTION</u>
1	March 1, 2018	SSA payment of \$750.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to the Eastern District of Pennsylvania.
2	March 30, 2018	SSA payment of \$750.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to the Eastern District of Pennsylvania.
3	May 1, 2018	SSA payment of \$750.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to the Eastern District of Pennsylvania.
4	June 1, 2018	SSA payment of \$750.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to the Eastern District of Pennsylvania.
5	June 28, 2018	SSA payment of \$750.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to the Eastern District of Pennsylvania.

All in violation of Title 18, United States Code, Section 1343.

**COUNT SIX**

**(Social Security Fraud)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 6 and 9 through 10 of Counts One through Five of this indictment are realleged here.

2. From in or about March 2010 to in or about July 2018, in the Eastern District of Pennsylvania, and elsewhere, defendant

**SAROM SOT**

in a matter within the jurisdiction of the SSA, having knowledge of the death of S.S., an event affecting S.S.'s initial and continued right to any SSA SSI payments, knowingly and willfully concealed and failed to disclose the death of S.S. with the fraudulent intent to secure approximately \$72,712.00 in SSA payments.

In violation of Title 42, United States Code, Section 1383a(a)(3).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Section 1343, set forth in Counts One through Five of this indictment, defendant

**SAROM SOT**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses; including but not limited to the sum of \$72,712.00.

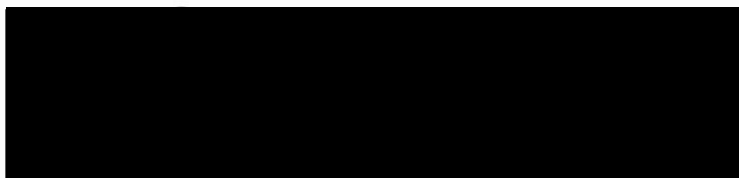
2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,  
United States Code, Section 981(a)(1)(C).

**A TRUE BILL:**



*Ronald Barack for*

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**JENNIFER ARBITTIER WILLIAMS**  
United States Attorney



No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

vs.

**SAROM SOT**

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**INDICTMENT**

Counts

**18 U.S.C. §1343 (wire fraud – 5 counts)**

**42 U.S.C. § 1383a(a)(3) (Social Security fraud – 1 count)**

**Notice of forfeiture**

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Filed in open court this \_\_\_\_\_ day,  
Of February, A.D. 20 22

\_\_\_\_\_  
Clerk

Bail, \$ \_\_\_\_\_

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